

**Los Angeles County Municipal Storm Water Permit (Order 01-182)**  
**Individual Annual Report Form**  
**Attachment U-4**

This form summarizes the requirements in Order No. 01-182. Each Permittee must complete this form in its entirety, except for those requirements applicable only to the Principal Permittee. Only report activities that were performed during the previous fiscal year. Upon completion, this form shall be submitted to the Principal Permittee, by the date specified by the Principal Permittee, for inclusion in the unified Annual Storm Water Program Report. Attachments should be included where necessary to provide sufficient information on program implementation.

The goals of this Report are to: 1) concisely document implementation of the Storm Water Quality Management Program (SQMP) during the past fiscal year; 2) evaluate program results for continuous improvement; 3) to determine compliance with Order 01-182; and 4) to share this information with other Permittees, municipal decision makers, and the public.

<b>!</b>	YOU MUST FILL OUT ALL THE INFORMATION REQUESTED <i>Do not leave any of the sections blank.</i>
<b>N/A</b>	If the question does not apply to your municipality, please indicate N/A in the space provided and provide a brief explanation
<b>U</b>	If the information requested is currently unavailable, please indicate U in the space provided and give a brief explanation.

This Report Form consists of the following sections:

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**Los Angeles County Municipal Storm Water Permit (Order 01-182)****Individual Annual Report Form****Attachment U-4****Reporting Year 2006- 2007****I. Program Management**A. Permittee Name: CITY OF TORRANCEB. Permittee Program Supervisor: Jeffery W. GibsonTitle: Community Development DirectorAddress: 3031 Torrance BlvdCity: TorranceZip Code: 90501Phone: (310) 618-5868Fax: (310) 618-5829

C. In the space below, briefly describe how the storm water program is coordinated within your agency's departments and divisions. Include a description of any problems with coordination between departments. To facilitate this, complete the Table 1.

The City of Torrance has implemented an Urban Storm Water Committee with representatives for the City Manager, Community Development and Public Works Dept. to coordinate between departments and divisions and assigned staff from these monitor and implement NPDES requirements. These duties have been added to staff's existing responsibilities. Consultants are hired to assist with training and designing regional BMP's.

**TABLE 1 - Program Management**

<b>Storm Water Management Activity</b>	<b>Division/Department</b>	<b># of Individuals Responsible for Implementing</b>
1. Outreach & Education	Public Works, Community Development, City Manager	6
2. Industrial/Commercial Inspections	Fire	2
3. Construction Permits/Inspections	Public Works, Community Development	6
4. IC/ID Inspections	Public Works, Community Development	3
5. Street sweeping	Public Works, Community Services	8
6. Catch Basin Cleaning	Public Works	12
7. Spill Response	Public Works, Community Development, Fire	12
8. Development Planning (project/SUSMP review and approval)	Public Works, Community Development	5
9. Trash Collection	Public Works, Community Services, Transit	Transit- 7 PW/CS- 30

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D. Staff and Training

Attach a summary of staff training over the last fiscal year. This shall include the staff name, department, type of training, and date of training.

[See attachment of City Wide Training session information](#)

E. Budget Summary

1. Does your municipality have a storm water utility? Yes ☐ No ☒

If no, describe the funding source(s) used to implement the requirements of Order No. 01-182.

[General Fund, Enterprise \(Transit, Refuse, Sewer and Water\) Funds, Fees](#)

2. Are the existing financial resources sufficient to accomplish all required activities? Yes ☐ No ☒  
[We have unfunded projects for TMDL, now in permit](#)

3. Complete Table 2 to the extent that accurate information is available (indicate U in the spaces where the information is unavailable), and report any supplemental dedicated budgets for the same categories on the lines below the table.

4. List any additional state/federally funded projects related to storm water.

[Public Works: The City's school education program on storm drain pollution is funded in part by the Used Oil Recycling Block Grant provided by the California Integrated Waste Management Board. A new website on used oil recycling developed last year was also funded by the same grant.](#)

[The Madrona Marsh Restoration and Enhancement Project receive Prop.12 grant funds from the Santa Monica Bay Restoration Commission.](#)

[City Yard Water Quality improvement project. Partially funded by State Water Resource Control Board](#)

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<b>Program Element</b>	<b>Expenditures in Fiscal Year 2006-2007</b>	<b>Estimated Amount Needed to implement Order 01-182</b>
1. Program management a. Administrative costs b. Capital costs	137,258.39	\$250,000
2. Public Information and Participation a. Public Outreach/Education b. Employee Training c. Corporate Outreach d. Business Assistance	50,000 (implemented Green Waste Program) 28,359.83 (Training & Outreach)	50,000 40,000
3. Industrial/Commercial inspection/site visit activities	39,058	50,000
4. Development Planning	15,550	20,000
5. Development Construction a. Construction inspections	27,305.92 (BMP Inspections and investigations)	35,000
6. Public Agency Activities a. Maintenance of structural and treatment control BMPs b. Municipal street sweeping c. Catch basin cleaning d. Trash collection/recycling e. Capital costs f. Other	0 1,085,000 (PW- Sanitation) 110,000 89,673 (Transit) 40,000 (PW-Engineering)	0 1,300,000 220,000 95,000 (Transit) 40,000 500,000 City Yard BMP 250,000 Detention Basins
7. IC/ID Program a. Operations and Maintenance b. Capitol Costs	8,967.66	15,000
8. Monitoring (TMDL)		75,000
9. Other (Parks Services)	15,000	15,000
10. TOTAL	<b>1,666,173</b>	<b>2,955,000</b>

List any supplemental dedicated budgets for the above categories:

- Transit - \$62,437 (contract services)
- Transit - \$27,236 (salary- employee performing NPDES duties)
- Programmatic Solutions and Source Identification BMP's (\$125,000) for Santa Monica Bay Beaches Bacteria TMDL Jurisdictional Groups 5&6
- Pre-Design for BMP projects for detention basins tributary to Santa Monica Bay (\$250,000)
- Street Sweeping Waste Dewatering Facility (\$485,000)

List any activities that have been contracted out to consultants/other agencies:

Transit - All bus stops (72) that have bus shelters are serviced by subcontractor that the City of Torrance has an agreement with. There are no charges to the City for these services. Three hundred (300) other stops are serviced by contractor under agreement with the Transit Service. All other stops are serviced by Torrance Transit staff. Public Works: The City is in the process of developing a Watershed Master Plan to address pending NPDES Permit & TMDL's (\$150,000)

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**II. Receiving Water Limitations (Part 2)**

- A. Are you aware, or have you been notified, of any discharges from your MS4 that cause or contribute to a condition of nuisance or to the violation of any applicable water quality standards? Yes ☐ No ☒
- B. Has the Regional Board notified you that discharges from your MS4 are causing or contributing to an exceedance of water quality standards? Yes ☐ No ☒
- C. If you answered Yes to either of the above questions, you must attach a Receiving Water Limitations (RWL) Compliance Report. The Report must include the following:
1. A description of the pollutants that are in exceedance and an analysis of possible sources;
  2. A plan to comply with the RWL (Permit, Part 2);
  3. Changes to the SQMP to eliminate water quality exceedances;
  4. Enhanced monitoring to demonstrate compliance; and
  5. Results of implementation.

**III. SQMP Implementation (Part 3)**

- A. Has your agency implemented the SQMP and any additional controls necessary to reduce the discharges of pollutants in storm water to the maximum extent practicable? Yes ☒ No ☐
- B. If your agency has implemented additional or different controls than described in the countywide SQMP, has your agency developed a local SQMP that reflects the conditions in its jurisdiction and specifies activities being implemented under the appropriate elements described in the countywide SQMP? Yes ☒ No ☐
- C. Describe the status of developing a local SQMP in the box below.

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The City has implemented the BMP's required under the SQMP. This includes BMP's associated with development planning, construction, illicit connection/discharge detection and elimination, and public agency programs. The City is in the process to develop a plan to use the City's retention and detention basin as sub-regional (BMP's).

*The City developed the "NPDES-BEST MANAGEMENT PRACTICES" Standard (T303-0) which are issued with all work by private contractors within the public right-of-way, as minimum requirement. See attachment in required attachments labeled "NPDES-BMP".*

- D. If applicable, describe an additional BMP, in addition to those in the countywide SQMP, that your city has implemented to reduce pollutants in storm water to the maximum extent practicable.

- Weekly street sweeping of all streets and sweeping of City-owned parking lots twice a month.
- Trash receptacles in most City controlled public parking lots and at City sponsored events.
- Trash receptacles at transit stops.
- CDS units installed at Torrance Beach
- Three retention basins are certified by the Board as BMP.
- Outlawed smoking on the beach

- E. Watershed Management Committees (WMCs)

1. Which WMC are you in? Dominguez Channel & L.A. Harbor and represented in Santa Monica Bay Jurisdictional Group 6
2. Who is your designated representative to the WMC?  
John Dettle, Project Manager – Public Works  
Leslie Cortez, Senior Admin, Analyst – Community Development
3. How many WMC meetings did you participate in last year?  
All WMC meetings were attended as required by NPDES requirement.
4. Describe specific improvements to your storm water management program as a result of WMC meetings.

WMC meetings are useful in tracking TMDL and discussing implementation, they also and keep the agency liaisons informed of all the latest developments and new programs. They have been especially helpful in providing tools, information and resources pertaining to structural BMP's for trash and other pollutants. The meetings were also useful in identifying and discussing watershed-wide issues that affect all agencies.

5. Attach any comments or suggestions regarding your WMC.

The WMC would be far more constructive if Board Staff were present to discuss Board regulations and define expectations.

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**F. Storm Water Ordinance**

1. Have you adopted a storm water and urban runoff ordinance to enforce all requirements of Order 01-182? Yes ☒ No ☐

If not, describe the status of adopting such an ordinance.

*See attachment in required attachments section under Storm Water Ordinance*

2. If yes, have you already submitted a copy of the ordinance to the Regional Board? Yes ☒ No ☐  
If not, please attach a copy to this Report.

3. Were any amendments made to your storm water ordinance during the last fiscal year? Yes ☐ No ☒  
If yes, attach a copy of amendments to this Report.

**G. Discharge Prohibitions**

1. List any non-storm water discharges you feel should be further regulated:

*The Board should require all water agencies that have permitted discharges to coordinate those discharges with the Principle Permittee. Fire Hydrant flushing in drainage areas tributary to dry weather diversion pump stations should take place only at night and be planned, not to exceed pump station capacity.*

2. List any non-storm water discharges you feel should be exempt, and provide an explanation for each:

- *Incidental potable water discharges from Fire Hydrants used to fill street sweepers during their routes.*
- *Any discharges relative to testing structural BMP's.*

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In addition to answering the following questions, attach a summary of all storm water education activities that your agency conducted or participated in last year.

**1. No Dumping Message**

- a) How many storm drain inlets does your agency own? 1236
- b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? 1236
- c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? 1236

If this number is less than the number in question 1.b, describe why all inlets have not been marked, the process used to implement this requirement, and the expected completion date.

None at this time.

- d) How many public access points to creeks, channels, and other water bodies within your jurisdiction have been posted with no dumping signage in the past year? 66

Describe your agency's status of implementing this requirement by the date required in Order No. 01-182.

All public access points to creeks, channels, and other water bodies within our jurisdiction have been posted with no dumping signage.



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2. Reporting Hotline

- a) Has your agency established its own hotline for reporting and for general storm water management information? Yes ☐ No ☒
- b) If so, what is the number?
- c) Is this information listed in the government pages of the telephone book? Yes ☐ No ☒
- d) If no, is your agency coordinated with the countywide hotline? Yes ☒ No ☐
- e) Do you keep record of the number of calls received and how they were responded to? Yes ☒ No ☐
- f) How many calls were received in the last fiscal year? 35
- g) Describe the process used to respond to hotline calls.

Typically a resident or staff member will contact the City's NPDES Program Coordinator, who can provide general information, expedite the request by referring them to the appropriate department (ie: Public Works if reporting a spill or request for service), or refer the caller to the countywide hotline, 888-CLEANLA.

Public Works/ Community Development: Report of illicit discharges/connections are evaluated for immediate response. The first task is to determine what kind of discharge is being reported by asking the reporting party if the discharge is discolored or has an odor and if it is in progress. If the discharge is in progress and appears to be particularly harmful (e.g., dumping of what could be considered hazardous or toxic materials/waste) the matter is referred to fire or police for an immediate response. If the discharge is sewage, the incident is referred to Public Works for an immediate response. For/less serious discharges (e.g., wash water), a visit is scheduled as soon as possible. Environmental safety officer responds to non emergency calls.

- h) Have you provided the Principal Permittee with your current reporting contact information? Yes ☒ No ☐
- i) Have you compiled a list of the general public reporting contacts for all Permittees and posted it on the [www.888CleanLA.com](http://www.888CleanLA.com) web site (Principal Permittee only)? Yes ☐ No ☒

If not, when is this scheduled to occur? The City of Torrance is not the principal Permittee

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3. Outreach and Education

- a) Describe the strategy developed to provide outreach and bilingual materials to target ethnic communities. Include an explanation of why each community was chosen as a target, how program effectiveness will be determined, and status of implementation.  
(Principal Permittee only)

The City of Torrance is not the Principal Permittee

- b) Did the Principal Permittee organize quarterly Public Outreach Strategy meetings that you were aware of? Yes ☒ No ☐  
How many Public Outreach Strategy meetings did your agency participate in last year? 3  
Explain why your agency did not attend any or all of the organized meetings.

The City of Torrance has attended all of the quarterly meetings.

Identify specific improvements to your storm water education program as a result of these meetings:

N/A

List suggestions to increase the usefulness of quarterly meetings:

N/A

If quarterly Public Outreach Strategy meetings were not organized, explain why not and when this requirement will be implemented (Principal Permittee only).

Torrance is not the Principal Permittee

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- c) Approximately how many impressions were made last year on the general public about storm water quality via print, local TV, local radio, or other media?

71,000 Earth Day Flyers

200 local cable spots

386 hits to new oil recycling web site since April 2007

1700 Torrance Employee Newsletter (InfoBits) distributed to all employees

- d) Describe efforts your agency made to educate local schools on storm water pollution.

Public Works/Waste Management: Spots from a Smart Gardening DVD produced by the County of Los Angeles have been showing on the City's cable periodically throughout the year. It includes segments on yard waste reduction and use of chemicals that overlap with storm drain pollution education efforts. Gave over 30 elementary school presentations on Household Hazardous Waste, oil and storm drain pollution in February. Also provided handouts of pocket ashtrays and "bags on board" for pets and other related literature at events with family attendance.

We implemented the Living Wise education program again this year. In April and May of 2007, Public Works contracted to have this program provided to 1300 6th grade students. The program focuses on water and energy conservation, with a little on recycling, hazardous waste and storm drain pollution. Funding was through General Fund and participating private agencies.

- e) Did you provide all schools within each school district in Los Angeles County with materials necessary to educate a minimum of 50 percent of all school children (K-12) every 2 years on storm water pollution (*Principal Permittee only*)? Yes ☐ No ☒
- If not, explain why.

The City of Torrance is not the Principal Permittee

- f) Describe the strategy developed to measure the effectiveness of in-school educational programs, including assessing students' knowledge of storm water pollution problems and solutions before and after educational efforts (*Principal Permittee only*).

The City of Torrance is not the Principal Permittee

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For Permit Years 2-5, attach an assessment of the effectiveness of in-school storm water education programs.

- g) What is the behavioral change target that was developed based on sociological data and other studies (*Principal Permittee only*)?

The City of Torrance is not the Principal Permittee

If no target has been developed, explain why and describe the status of developing a target. N/A

What is the status of meeting the target by the end of Year 5?  
N/A

4. Pollutant-Specific Outreach

- a) Attach a description of each watershed-specific outreach program that your agency developed (*Principal Permittee only*). All pollutants listed in Table 1 (Section B.1.d.) must be included.
- b) Did your agency cooperate with the Principal Permittee to develop specific outreach programs to target pollutants in your area? Yes ☒ No ☐
- c) Did your agency help distribute pollutant-specific materials in your city? Yes ☒ No ☐
- d) Describe how your agency has made outreach material available to the general public, schools, community groups, contractors and developers, etc...

Direct mailers in water bills and City newsletter, brochures at events such as Earth day and Open House and within posting areas like libraries and the City Clerk's office, Chamber of Commerce, Public Counters. Materials are also distributed during presentations. Printed material is also made available at the public counters within several City departments. A new website was developed on used oil recycling for residents with information on storm drain pollution and recycling drop-off sites. While site has been available since the end of April, we will do a formal kick-off off site to the public during the next reporting period.

5. Businesses Program

- a) Briefly describe the Corporate Outreach Program that has been developed to target gas stations and restaurant chains (*Principal Permittee only*).

The City of Torrance is not the Principal Permittee however we participated in the Restaurant Certification Program and have distributed Environmental Compliance Brochures to restaurants and gas stations.

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- b) How many corporate managers did your agency (*Principal Permittee only*) reach last year? **N/A**
- c) What is the total number of corporations to be reached through this program (*Principal Permittee only*)? **N/A**
- d) Is your agency meeting the requirement of reaching all gas station and restaurant corporations once every two years (*Principal Permittee only*)? Yes ☐ No ☒  
 If not, describe measures that will be taken to fully implement this requirement. **Applies to Principal Permittee only.**
- e) Has your agency developed and/or implemented a Business Assistance Program? Yes ☐ No ☒  
 If so, briefly describe your agency's program, including the number of businesses assisted, the type of assistance, and an assessment of the program's effectiveness.

**Applies to Principal Permittee only, however the City of Torrance did hand out flyers, "Environmental resources for Businesses and "Get Green" brochures to the local businesses.**

6. Did you encourage local radio stations and newspapers to use public service announcements? Yes ☒ No ☐  
 How many media outlets were contacted? **2**  
 Which newspapers or radio stations ran them?

**Daily Breeze, Torrance CitiCable**

Who was the audience?

**General Public (residents and City employees)**

7. Did you supplement the County's media purchase by funding additional media buys? Yes ☐ No ☒  
 Estimated dollar value/in-kind contribution:  
 Type of media purchased:  
 Frequency of the buys:  
 Did another agency help with the purchase? Yes ☐ No ☒

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8. Did you work with local business, the County, or other Permittees to place non-traditional advertising? Yes ☒ No ☐

If so, describe the type of advertising.

The City of Torrance is not the principal permittee, however, we worked with local businesses and agencies through several sources:

- City of Torrance Website
- Home Depot check-out stand distribution of household hazardous waste collection and event information
- Flyers, posters and TV coverage for the annual Coastal Clean-Up Day
- Flyers and waste management event information inserted with trash/water bills and mailers
- Special public outreach event with Toyota Motor Corp. featuring "An Inconvenient Truth"
- Special booth display and viewing of "An Inconvenient Truth" with Library
- Restaurants identified as Clean Bay certified by the SMBRC posted certificates

9. Did you establish local community partnerships to distribute educational storm water pollution prevention material? Yes ☒ No ☐

Describe the materials that were distributed:

- Give a ways to the public during California Coastal Clean-up Day and the City Yard Open House, the City Health and Rideshare Fair, and at NPDES City Wide Training sessions.
- Home Depot check-out stand distribution of household hazardous waste collection event information
- Flyers and waste management event information inserted with trash/water bills/mailers
- Give a ways and hand outs at the Library and Toyota events.
- Oil Pledge Cards posted at various gas stations

Who were the key partners? Schools, local businesses, Heal The Bay and California Coastal Commission

Who was the audience (businesses, schools, etc.)?

General public to include schools, businesses, City staff and local businesses.

10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes ☒ No ☐

How many events did you attend? 5

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11. Does your agency have a website that provides storm water pollution prevention information?

Information is posted throughout the City website ([www.torrnet.com](http://www.torrnet.com)) within different department pages. A new used oil recycling webpage was added, "Recycle Torrance" City's website has a link to Los Angeles County Environmental Resources website, which has a "storm water" information homepage. Links to USEPA, Integrated Pest Management (IPM), California Coastal Commission, State Water Resource Control Board, and Heal the Bay, and 888CleanLA

Yes ☒ No ☐

If so, what is the address? [www.torrnet.com](http://www.torrnet.com) (under Government, select Public Works or Community Development)

12. Has awareness increased in your community regarding storm water pollution?

Yes ☒ No ☐

Do you feel that behaviors have changed?

Yes ☒ No ☐

Explain the basis for your answers. Include a description of any evaluation methods that are used to determine the effectiveness of your agency's outreach.

The City receives feedback from the general public at City Council Meetings, Community Meetings (Homeowners Associations), business events, and City sponsored events such as the City Yard Open House and Earth Day. Feedback sheets from employees attending the citywide Public Agency training for NPDES are collected and reviewed.

13. How would you modify the storm water public education program to improve it on the City or County level?

Continue to expand to other grade levels (junior high and high school), develop a procedure for evaluation, focus program to specific adult target audiences, create additional materials for other outreach methods (bus signs, cable TV spots, etc.) Coordinate/Participate in more City sponsored outreach events for public participation and awareness. Work more closely with heal The Bay and California Coastal Commission, the State and County to develop more creative and interactive programs and outreach events that would generate interest. The County should have a focused advertised campaign to reduce cigarette butt litter (PSA's outlawing smoking on the beach)





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**B. Industrial/Commercial Facilities Program**

**1. Critical Source Inventory Database**

Did you (individually or jointly) update the Database for Critical Sources Inventory?

Yes ☒ No ☐

Comments/Explanation/Conclusion:

Fire: The database is updated on a weekly basis. A copy of all new business licenses received by the City is sent to the NPDES inspector for review to determine if any of the businesses are required to be inspected. Also the inspector is looking out for new businesses in the field, which need to be inspected and added to the database.

**2. Inspection Program**

Provide the reporting data as suggested in the following tables.

Category	Initial Number of Facilities at the start of cycle proposed for inspection by categories (after the initial year, the updated number based on the new data)	Number of facilities inspected in the current reporting year	% Completed at the time of this report for present cycle (from the initial value, and from the updated value after first cycle)	Total number since permit adoption
Landfills	N/A	N/A	N/A	N/A
TSDf	N/A	N/A	N/A	N/A
Food Establishments	392	317	80%	1009
Automotive Services	102	145	142%	284
Industrial	141	220	156%	447
Retail Gasoline Station	7	10	143%	87
TOTAL	682	692	101%	1827

Comments/Explanation/Conclusion:

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**3. BMPs Implementation**

Provide the reporting data as suggested in the following table.

Category	Number of facilities inspected by category in this reporting year	Number of facilities identified as adequately implementing BMPs as specified in this reporting year	% adequately implementing out of total in this reporting year	Number of facilities required to implement or upgrade in this reporting year	Number of facilities inspected by category in this reporting cycle	Number of facilities identified as adequately implementing BMPs as specified in this reporting cycle	% adequately implementing out of total in this reporting cycle	Number of facilities required to implement or upgrade in this reporting cycle	Total Number during this permit adequately implementing	Total Number during this permit required to implement or upgrade
Landfills	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TSDf	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Food Establishment	317	124	39%	193	1009	506	50%	503	506	503
Retail Gas Outlet	10	4	40%	6	87	25	29%	65	25	65
Automotive Services	145	41	28%	104	284	87	31%	197	87	197
Industrial	220	141	64%	79	447	255	57%	192	255	192

Comments/Explanation/Conclusion:

Compared to last year's annual report, restaurant compliance has decreased by 8%, automotive facility compliance has decreased by 30%, industrial facility compliance has increased by 9% and retail gasoline station compliance has increased by 24%.

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**4. Enforcement Activities**

Provide the reporting data as suggested in the following tables.

Enforcement Actions by categories (e.g. Warning letter, NOV, referral to D.A., etc.)	Number of facilities issued enforcement actions in the current reporting year	Number of facilities issued enforcement actions in the current reporting cycle	Number of facilities (re)inspected due to enforcement actions in current reporting year	Number of facilities (re)inspected due to enforcement actions in current reporting cycle	Number of facilities brought into compliance in the current reporting year	Number of facilities brought into compliance in current reporting cycle	Total number of enforcement actions since permit adoption (by category)
NOV	1	1	1	1	1	1	

Facilities by category	Number of Warning letters	Number of NOVs	Number of Referral	Number of Other
Restaurant	1	1	0	0
Comments/Explanation/Conclusion:		Inspection reports were sent to business owners/operators explaining what BMP's needed to be implemented or improved upon. No follow-up action has occurred to date. The next round of inspections will be used to assess implementation and improvement of previous violations and any new violations on facility grounds.		

**5. Program Implementation Effectiveness Assessment**

Please give a brief assessment of the implementation of the program in removing pollutants from the storm water discharges. Please provide an explanation. Suggested improvements or adjustments based on the knowledge gained through this reporting period activities must be reflected in a change in the SQMP, if warranted.

Highly Effective ☐

Somewhat Effective ☒

Non-effective ☐

Comments/Explanation/Conclusion: Increased street sweeping and catch basin cleaning have decreased trash entering into the MS4

**6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities.**

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C. Development Planning Program (Part 4.D)

1. Does your agency have a process to minimize impacts from storm water and urban runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under CEQA, Section 404 of the CWA, local ordinances, and other legal authorities? Yes ☒ No ☐  
Attach examples showing how storm water quality impacts were addressed in environmental documents for projects over the past year.
2. Does your agency have procedures to include the following requirements in all priority development and redevelopment projects:
  - a) Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground? Yes ☒ No ☐
  - b) Minimize the quantity of storm water directed to impermeable surfaces and the MS4? Yes ☒ No ☐
  - c) Minimize pollution emanating from parking lots through the use of appropriate treatment control BMPs and good housekeeping practices? Yes ☒ No ☐
  - d) Provide for appropriate permanent measures to reduce storm water pollutant loads from the development site? Yes ☒ No ☐
3. List the types and numbers of BMPs that your agency required for priority projects to meet the requirements described above.

Our Torrance Municipal Code, and the policy and practice of the Planning Department in requiring conditions of approval for zoning entitlements, prescribes building setbacks, mandates landscaping, and limits lot coverage, building size and building siting. In addition, the City encourages developers to incorporate design features into the project in order to meet SUSMP's requirements. The use of extensive areas of landscaping, the reduction of paved surfaces, the use of turf block, drainage swales and onsite retention are recommended design features that have been incorporated into projects within the last year. Staff has made suggestions such as utilizing turf block in emergency access roads, some parking areas and other areas with light or occasional traffic. Furthermore, many projects have incorporated clarifiers and onsite retention systems. Lastly, the City requires projects to provide trash receptacles, and covered trash enclosures to reduce litter and other storm water pollutants. **Number of BMP's: 14**

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4. Describe the status of the development or implementation of peak flow controls in Natural Drainage Systems.

Not a requirement of Torrance, the City does not have any natural drainage systems.

5. Has your agency amended codes and/or ordinances to give legal effect to the SUSMP changes required in the Permit? Yes ☒ No ☐
6. Describe the process your agency uses to include SUSMP design standards in new development and redevelopment project approvals.

During the Development Planning stage of a project, applicants are advised of the SUSMP requirements at the public counter. Furthermore, as nearly every priority development or redevelopment project requires Planning Commission approval, it is the City's procedure to require these types of project to participate in an initial plot plan review meeting with concerned City departments. During these meetings, the applicant is advised of code requirements and special conditions that are applicable to their project. This includes various techniques to comply with SUSMP requirements. Once the project is submitted to the Planning Commission for review, these comments are included as code requirements or special conditions of approval in the resolution for the project.

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7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- |    |  |    |
|----|--|----|
| a) | Residential  | 2  |
| b) | Commercial   | 4  |
| c) | Industrial   | 2  |
| d) | Automotive Service Facilities  | 1  |
| e) | Retail Gasoline Outlets  | 2  |
| f) | Restaurants  | 2  |
| g) | Parking Lots   | 1  |
| h) | Projects located in or directly adjacent to or discharging directly to an environmentally sensitive area | 0  |
| i) | Total number of permits issued to priority projects  | 14 |
8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements? 20 %
9. How has your agency prepared to reduce the SUSMP threshold for industrial/commercial facilities to 1 acre from 100,000 square feet in 2003?

The City of Torrance has incorporated this requirement into the Municipal Code and it is being enforced.

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10. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? N/A

11. Does your agency participate in an approved regional or sub-regional storm water mitigation program to substitute in part or wholly SUSMP requirements for new development?

The drainage areas tributary to Bishop, Del Amo and Ocean Basins are recognized by the Board as Sub-regional substitute for SUSMP

Yes ☒ No ☐

12. Has your agency modified its planning procedures for preparing and reviewing CEQA documents to consider potential storm water quality impacts and provide for appropriate mitigation?

Yes ☒ No ☐

If no, provide an explanation and an expected date of completion.

13. Did your agency update any of the following General Plan elements in the past year?

a) Land Use Yes ☐ No ☒

b) Housing Yes ☐ No ☒

c) Conservation Yes ☐ No ☒

d) Open Space Yes ☐ No ☒

If yes, please describe how watershed and storm water quality and quantity management considerations were included.

The City of Torrance is in the process of a comprehensive update of the General Plan. The Community Resource Element, which encompasses the topics of conservation, open space and parks and recreation, will address water quality and protection and conservation of water resources. The Community Resource Element will include policies for protecting water quality that are consistent with current NPDES requirements. The City will continue implementing programs that educate the public about water pollution and enforce against water quality violators.

Policy from Draft Community Resource Element

POLICY CR.14.5: Enforce regulations aimed at reducing groundwater and urban runoff pollution, including the National Pollutant Discharge Elimination System (NPDES) requirements of the Regional Water Quality Control Board

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14. How many targeted staff were trained last year? 283
15. How many targeted staff are trained annually? 300-400
16. What percentage of total staff are trained annually?  
70%
17. Has your agency developed and made available development planning guidelines? Yes ☒ No ☐
18. If no, what is the expected date that guidelines will be developed and available to developers?
19. What is the status of completion of the technical manual for siting and design of BMPs for the development community?

The City of Torrance is following the technical manual under development by the Principal Permittee, with future amendments



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D. Development Construction Program

1. Describe your agency's program to control runoff from construction activity at all construction sites within its jurisdiction.

In the 2006-07 permit year, inspections for compliance with construction BMP's were made in the course of every site visit during the construction. Spot checks are done before storm events to ensure correct placement of erosion control measures.

2. Does your agency require the preparation, submittal, and implementation of a Local Storm Water Pollution Prevention Plan (Local SWPPP) prior to the issuance of a grading permit for all sites that meet one or all of the following criteria?

- a) Will result in soil disturbance of one acre or greater Yes ☒ No ☐
- b) Is within, directly adjacent to, or is discharging directly to an environmentally sensitive area Yes ☒ No ☐
- c) Is located in a hillside area Yes ☐ No ☒

3. Attach one example of a local SWPPP
4. Describe the process your agency uses to require proof of filing a Notice of Intent for coverage under the State General Construction Activity Storm Water permit and a certification that a SWPPP has been prepared prior to issuing a grading permit?

As part of Grading plan check, the applicant must provide a Waste Discharge I.D. number and a copy of the State SWPPP, or a local SWPPP must be submitted for review.

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5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? 7
6. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? 2382/11
7. How many building/grading permits were issued to construction site less than one acre in size last year? 2103/72
8. How many construction sites were inspected during the last wet season? 876
9. Complete the table below.

Type of Violation	# of Violations	% of Total Inspections	# of Follow-up Inspections	# of Enforcement Actions
Off-site discharge of sediment	14	1%	32	0
Off-site discharge of other pollutants	22		22	0
No or inadequate SWPPP	5	.2	1	0
Inadequate BMP/SWPPP implementation	38	2.3	60	0

10. Describe the process for taking enforcement actions against construction site violations, including the types of actions that are taken.

An instance of non-compliance with any of the development construction program requirements triggers a verbal warning, followed by a Notice of Violation letter. If non-compliance persists, the matter then becomes a code enforcement issue. However, the verbal warnings coupled with the threat of referring the contractor to the Regional Board for stronger enforcement action, has been sufficient to compel compliance.

11. Describe the system that your agency uses to track the issuance of grading permits.

The City of Torrance uses PermitPlan – a permit issuance computer program to issue and track all grading permits.

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E. Public Agency Activities (Part 4.F)

1. Sewage System Maintenance, Overflow, and Spill Prevention  
(only applicable to agencies that own and/or operate a sanitary sewer system)
  - a) Has your agency developed and implemented a response plan for sanitary sewer overflows that includes the requirements in Order 01-182? Yes ☒ No ☐
  - b) How many sanitary sewer overflows occurred within your jurisdiction? 8
  - c) How many did your agency respond to? 8
  - d) Did your agency investigate all complaints received? Yes ☒ No ☐
  - e) How many complaints were received?
  - f) Upon notification, did your agency immediately respond to overflows by containment? Yes ☒ No ☐
  - g) Did your agency notify appropriate sewer and public health agencies when a sewer overflowed to the MS4? Yes ☒ No ☐
  - h) Did your agency implement a program to prevent sewage spills or leaks from sewage facilities from entering the MS4? Yes ☒ No ☐  
If so, describe the program:

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Notification procedure (Public Works): All sewage spills, regardless of the amount, are to be reported to the supervisor immediately. Sewage spills greater than 100 gallons are to be reported as soon as the person has knowledge of the discharge, notification is possible, and notification can be provided without substantially impeding clean-up or other emergency measures immediately to the Office of Emergency Services.

Sewage Spill Response Procedure (Public Works):

1. Respond to reported sewer leak/stoppage location and analyze the situation.
2. Set up traffic control for the public and crew's safety.
3. If manhole is overflowing or there is a mainline stoppage:
  - a. Clear stoppage using HydroJet equipment
  - b. Set up Vactor truck downstream at storm drain, manhole, or gutter (which ever is applicable) to pick up spilled sewage.
  - c. Flush spill site with fresh water and vacuum up water and sewage.
  - d. Complete spill report
4. If sewage is on private property:
  - a. Notify owner of the problem
  - b. If spill is leaking onto public property set up Vactor truck to pick up spill until problem is corrected.

If during working hours report spill until problem is corrected.
5. Complete spill report

- i) Did your agency implement a program to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers to the MS4?

Yes ☒ No ☐

If so, describe the program:

The City (Public Works Sanitation/Wastewater) implemented a sewer/storm drain/catch basin database that tracks the repairs, identifies locations of blockages, and details the type of repair or maintenance activity of debris. They also have a video inspection program to check condition of older sewers or sewers included as part of street rehabilitation projects.

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2. Public Construction Activities Management

- a) What percentage of public construction sites 5 acres or greater in size did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit ? 100 %
- b) Give an explanation for any sites greater than 5 acres that were not covered:

The City requires SWPPP for all Public Works projects, regardless of size.

- c) What is the total number of active public construction sites? 4  
How many were 5 acres or greater in size? 0
- d) (After March, 2003) Did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit coverage for public construction sites for sites one acre or greater? Yes ☐ No ☒

3. Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management

- a) Did your agency implement pollution prevention plans for each public vehicle maintenance facility, material storage facility, and corporation yard? Yes ☒ No ☐

SWPPP updated this year for Vehicle Maintenance Facility and City Airport as directed by RWQCB

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- b) Briefly describe how your agency implements the following, and any additional, BMPs to minimize pollutant discharges in storm water:

- (1) Good housekeeping practices
- (2) Material storage control
- (3) Vehicle leaks and spill control
- (4) Illicit discharge control

All of these requirements are dealing with the Pollution Prevention Plan, as specified under the previous municipal NPDES permit and in accordance with the public agency program. The Service Yard and City Airport has a separate permit and a SWPPP is available for inspection.

- c) Are all Permittee owned and/or operated vehicle/equipment wash areas self-contained, covered, equipped with a clarifier, and properly connected to the sanitary sewer? Yes ☒ No ☐

If not, what is the status of implementing this requirement?

- d) How many Permittee owned and/or operated vehicle/equipment wash areas are scheduled to be redeveloped to include the BMPs listed above?

4. Landscape and Recreational Facilities Management

- a) Has your agency developed a standardized protocol for the routine and non-routine application of pesticides, herbicides (including pre-emergents), and fertilizers? Yes ☒ No ☐

Briefly describe this protocol:

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Public Works/Streetscape & Community Services/Parks Services:  
Basically, the protocol or "SOP" calls for impacted landscape  
maintenance personnel to:

- 1) Apply minimum amounts of each significant material
- 2) Avoid application during storm events or impending storm  
Events
- 3) Use of pesticides and/or fertilizers are allowed after inspection of  
area and/or plants. Non-pesticide remedies are considered and  
used prior to pesticide/fertilizer application

- b) How does your agency ensure that there is no application  
of pesticides or fertilizers immediately before, during, or  
immediately after a rain event or when water is flowing off  
the area to be applied?

Pesticides are not applied when there is a 40% chance of rain in the  
next 24 hours; application is not allowed until ground is dry. Area  
supervisors are advised of application times and inform their  
respective crews to turn irrigation off 12 hours prior to application  
and 12 hours after. Pre-emergent pesticides are irrigated to a depth  
of 1/2 inch of soil with the applicator in direct control. Fertilizers are  
handled the same. No pesticide or fertilizer is applied if weather  
reports indicate more than a 10% chance of rainfall that will cause  
material to run off target site.

- c) Are any banned pesticides, herbicides,  
fungicides, or rodenticides stored or  
applied in your agency's jurisdiction  
that you know of?

Yes ☐ No ☒

If so, list them:

--

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- d) What percentage of your agency's staff that apply pesticides are certified by the California Department of Food and Agriculture, or are under the direct supervision of a certified pesticide applicator? 100%
- e) Describe procedures your agency has implemented to encourage retention and planting of native vegetation and to reduce water, fertilizer, and pesticide needs:

Landscape maintenance staff in Public Works and Community Services has been given training that encourages the planting of native and drought tolerant vegetation, which is also in keeping with the City's water conservation program. Impacted City staff have also been encouraged, also by training, to incorporate integrated pest management (IPM) whenever possible as a means of reducing the need for pesticides.

5. Storm Drain Operation and Management

- a) Did your agency designate catch basin inlets within its jurisdiction as Priority A; Priority B; and Priority C? Yes ☒ No ☐
- b) How many of each designation exist in your jurisdiction?
- |             |      |
|-------------|------|
| Priority A: | 11   |
| Priority B: | 74   |
| Priority C: | 1251 |
- c) Is your city subject to a trash TMDL? Yes ☐ No ☒
- d) If yes, describe the activities and/or implementation measures that your agency conducted pursuant to the TMDL and any other trash reduction efforts that occurred.



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- e) How many times were all Priority A basins cleaned last year? 4
- f) How many times were all Priority B basins cleaned last year? 2
- g) How many times were all Priority C basins cleaned last year? 1
- h) How much total waste was collected in tons from catch basin clean-outs last year? 23.71
- i) Attach a record of all catch basins in your jurisdiction. This shall identify each basin as City or County owned, and Priority A, B, or C. For all basins that are owned and operated by your agency, include dates that each was cleaned out over the past year.  
*See attachment in required attachments labeled # IV.E5*
- j) Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction. Yes ☒ No ☐
- k) How many new trash receptacles were installed last year? 114
- l) Did your agency place special conditions for events that generated substantial quantities of trash and litter including provisions that:
- (1) Provide for the proper management of trash and litter generated from the event? Yes ☒ No ☐
  - (2) Arrange for temporary screens to be placed on catch basins? Yes ☒ No ☐
  - (3) Or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain? Yes ☐ No ☒
- m) Did your agency inspect the legibility of the catch basin stencil or labels? Yes ☒ No ☐  
What percentage of stencils were legible? 100%

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- n) Were illegible stencils recorded and re-stenciled or re-labeled within 180 days of inspection? Yes ☒ No ☐
- o) Did your agency visually monitor Permittee-owned open channel storm drains and other drainage structures for debris at least annually and identify and prioritize problem areas of illicit discharge for regular inspection? Yes ☒ No ☐  
Is the prioritization attached? Yes ☐ No ☒
- p) Did your agency review its maintenance activities to assure that appropriate storm water BMPs are being utilized to protect water quality? Yes ☒ No ☐  
What changes have been made?

None during this past year.

- q) Did your agency remove trash and debris from open channel storm drains a minimum of once per year before the storm season? Yes ☒ No ☐
- r) How did your agency minimize the discharge of contaminants during MS4 maintenance and clean outs?

The open channels, which were maintained by the City, do not have flows during the maintenance period.

- s) Where is removed material disposed of?

Material is disposed of at local BFI Transfer Stations located in Compton and Wilmington, CA

**6. Streets and Roads Maintenance**

- a) Did your agency designate streets and/or street segments within its jurisdiction as one of the following:

Response: It is not necessary because the City sweeps the streets weekly, thereby meeting the frequency called for under Priority A

- (1) Priority A – streets and/or street segments that are designated as consistently generating the highest volumes of trash and/or litter? Yes ☐ No ☒

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- (2) Priority B - streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or litter? Yes ☐ No ☒
- (3) Priority C – streets and/or street segments that are designated as generating low volumes of trash and/or litter? Yes ☐ No ☒
- b) Did your agency perform all street sweeping in compliance with the permit and according to the following schedule:
- (1) Priority A – These streets and/or street segments shall be swept at least two times per month? Yes ☒ No ☐
- (2) Priority B - Each Permittee shall ensure that each streets and/or street segments is cleaned at least once per month? Yes ☒ No ☐
- (3) Priority C – These streets and/or street segments shall be cleaned as necessary but in no case less than once per year? Yes ☒ No ☐

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- c) Did your agency require that saw cutting wastes be recovered and disposed of properly and that in no case shall waste be left on a roadway or allowed to enter the storm drain? Yes ☒ No ☐
- d) Did your agency require that concrete and other street and road maintenance materials and wastes be managed to prevent pollutant discharges? Yes ☒ No ☐
- e) Did your agency require that the washout of concrete trucks and chutes only occur in designated areas and never into storm drains, open ditches, streets, or catch basins leading to the storm drain system? Yes ☒ No ☐
- f) Did your agency train its employees in targeted positions (whose interactions, jobs, and activities affect storm water quality) regarding the requirements of the storm water management program to:
- (1) Promote a clear understanding of the potential for maintenance activities to pollute storm water? and Yes ☒ No ☐
- (2) Identify and select appropriate BMPs? Yes ☒ No ☐

**7. Parking Facilities Management**

- a) Did your agency ensure that Permittee-owned parking lots be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. Yes ☒ No ☐
- b) Were any Permittee-owned parking lots cleaned less than once a month? Yes ☐ No ☒  
How many? 0

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8. Public Industrial Activities Management

- a) Did your agency, for all municipal activity considered an industrial activity under USEPA Phase I storm water regulations, obtain separate coverage under the State of California General Industrial Activities Storm Water Discharge Permit no later than December 31, 2001? Yes ☒ No ☐
- b) Does your agency serve a population of less than 100,000 people? Yes ☐ No ☒

9. Emergency Procedures

- a) In case of real emergencies, did your agency repair essential public services and infrastructure in a manner to minimize environmental damage? Yes ☒ No ☐
- b) Were BMPs implemented to the extent that measures did not compromise public health and safety? Yes ☒ No ☐

10. Feasibility Study

- a) Did your agency cooperate with the County Sanitation Districts of Los Angeles County to prepare a study which investigates the possible diversion of dry weather flows or the use of alternative treatment control BMPs? Yes ☒ No ☐
- b) Did your agency review its individual prioritized list and create a watershed based priority list of drains for potential diversion and submit a listing of priority diversions to the Regional Board Executive Officer? Yes ☒ No ☐

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F. Illicit Connections and Illicit Discharges (IC/ID) Elimination Program (Part 4.G)

1. Attach a copy of your agency's IC/ID Elimination Implementation Program (Part 4.G.1.a.). *See attachment in required attachments section*
2. Attach a map of your storm drain system showing all permitted connections (if available), and the locations of all illicit connections and discharges that occurred last year (Part 4.G.1.b). If your agency has not completed this requirement, describe the status of the development of a baseline map, including an expected completion date.

*See attached map of illicit discharges and permitted connections that occurred. See attachment in required attachments section*

3. Describe your enforcement procedures for eliminating illicit discharges and terminating illicit connections.

*Upon discovery of in progress illicit discharges, code enforcement, police or fire is summoned – depending on the type of materials are being discharged.*

4. Describe your record keeping system to document all illicit connections and discharges.

*Information is maintained in a filing system on each case until the case is discharged.*

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5. What is the total length of open channel that your agency owns and operates? 1.0 miles
6. What length was screened last year for illicit connections? 1.25 miles
7. What is the total length of closed storm drain that your agency owns and operates? 51.25 miles
8. What length was screened last year for illicit connections? 21 miles
9. Describe the method used to screen your storm drains.

As determined last year, We video inspected 21 miles of 36" Ø and greater. Visual observation of open channels with video inspection camera. No illicit connections were observed in the 21 miles of all storm drains videotaped.

10. Provide the reporting data for illicit connections as suggested in the following table (you may submit a spreadsheet from your database that contains the information).

Year	Total # reported/ identified	Total # investigated	# that conveyed exempt discharges or NPDES permitted	# that conveyed illicit discharges that were terminated	# that were removed	# that resulted in enforcement action	# that resulted in <i>other</i> actions
01/02	0	0	0	0	0	0	0
02/03	0	0	0	0	0	0	0
03/04	0	0	0	0	0	0	0
04/05	0	0	0	0	0	0	0
05/06	0	0	0	0	0	0	0
06/07	0	0	0	0	0	0	0

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11. Explain any *other* actions that occurred in the last year.

No other action occurred in the last year.

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported?

N/A

- a) Were all identified connections terminated within 180 days?

Yes ☐ No ☒

- b) If not, explain why.

Of the 21 miles of storm drains inspected, no illicit connections were found. Undocumented connections were added to storm drain base maps.

13. Provide the reporting data for illicit discharges as suggested in the following table (you may submit a spreadsheet from you database that contains this information).

Year	Total # reported	Total # that were discontinued/ cleaned up voluntarily through enforcement and the source was identified	# that were cleaned up but the source could not be identified	# that resulted in no evidence of discharge	# that were determined to be conditionally exempt	# that were exempt or in compliance and the source identified	# that resulted in enforcement action
01/02							
02/03	96	96	0	0	0	0	2
03/04	78	77	0	0	0	0	2
04/05	114	100	1	8	0	5	0
05/06	89	82	4	0	1	1	1
06/07	69	69	0	0	0	0	0



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14. What is the average response time after an illicit discharge is reported? Within ½ hour

a) Did any response times exceed 72 hours? Yes ☐ No ☒

b) If yes, explain why.

Of 21 miles of storm drains inspected no illicit connections were found. Undocumented connections were added to storm drain Base Maps.

15. Describe your agency's spill response procedures.

The following are the steps taken when responding to a spill:

- The assigned NPDES responding person is contacted.
- If the spill has left the site, the Public Works Department is contacted to help stop the flow before it reaches the storm drain.
- Traffic control is requested if needed.
- If the material is other than sewage or construction effluent, Torrance Fire Department Hazmat is called in.
- If the material has reached a storm drain, the government body the storm drain belongs to is notified.
- The property owner/manager of the spill site is contacted and informed to stop the flow and carry out effective clean up
- If the flow is sewage and stopping the problem is more than ½ hour, the owner/manager is asked to turn the fresh water supply source off voluntarily. If it is not voluntarily turned off, the Water Department is requested to turn the water off.
- If feasible, the NPDES responding person stays at the site through clean up.
- Follow up inspections are scheduled if deemed necessary and a report is completed after every response.

16. What would you do differently to improve your agency's IC/ID Elimination Program?

- Continue program of educating contractors about Best management Practices. Such a program is currently running
- Continued outreach efforts and GIS plotting of reporting illicit connections and illicit discharges

17. Attach a list of all permitted connections to your storm sewer system.

*See attachment in required attachments section*

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**V. Monitoring**

Briefly describe any storm water monitoring activities that are not required by Order No. 01-182 that your municipality conducted, participated in, or received funding to conduct in the past fiscal year. These activities should correspond with the dollar amount you listed in Table 2.

**VI. Assessment of Program Effectiveness**

- A. Attach a summary of the effectiveness of your storm water management program. This summary should include, at a minimum, the following:
  - 1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;
  - 2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;
  - 3. A summary of the strengths and weaknesses of your agency's storm water management program;
  - 4. A list of specific program highlights and accomplishments;
  - 5. A description of water quality improvements or degradation in your watershed over the past fiscal year;
  - 6. Interagency coordination between cities to improve the storm water management program;
  - 7. Future plans to improve your agency's storm water management program; and
  - 8. Suggestions to improve the effectiveness of your program or the County model programs.
- B. On a scale of 1 to 10 (10 being full implementation of requirements by their deadlines), rate your municipality's level of compliance with Order No. 01-182.
- C. List any suggestions your agency has for improving program reporting and assessment.